



California Regional Water Quality Control Board

Santa Ana Region

Terry Tamminen
Secretary for
Environmental
Protection

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Arnold Schwarzenegger
Governor

July 14, 2004

Mr. Timothy Haltmeyer, Manager
Environment, Health, Safety and Medical
Northrop Grumman Corporation
One Hornet Way, PA12/W9
El Segundo, CA 90245

RESPONSE TO LETTER AND REPORT DATED JUNE 4, 2004, GROUNDWATER INVESTIGATION RESULTS – CLEANUP AND ABATEMENT ORDER (CAO) NO. R8-2003-108, FORMER NORTHROP GRUMMAN CORPORATION (NGC) Y-12 FACILITY, 301 ORANGETHORPE AVENUE, ANAHEIM, CA

Dear Mr. Haltmeyer:

We have reviewed the letter cited above, submitted by Ms. McKeith on behalf of NGC, which provided the groundwater investigation results for the installation of new monitoring wells NMW-10A, B and C. The wells were installed pursuant to CAO No. R8-2003-108, to further characterize the groundwater downgradient of the former Y-12 facility. Analytical results of samples obtained from the wells indicate that in well NMW-10C, trichloroethylene (TCE) and tetrachloroethylene (PCE) were detected at concentrations of 12 parts per billion (ppb) and 3.3 ppb, respectively, and in well NMW-10B, PCE was detected at 19 ppb (NMW-10A is dry).

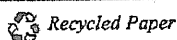
Based upon these results, and previous analytical results of samples obtained from wells at the site, it appears that no further investigations downgradient of the former Y-12 facility are necessary at this time, and that sufficient characterization of VOCs (volatile organic compounds) in groundwater has been accomplished in order to initiate groundwater remediation. Therefore, in accordance with Item 5 of CAO No. R8-2003-108, please submit a groundwater remediation plan and a time schedule by October 13, 2004 to clean up VOCs in groundwater that have resulted from discharges at NGC's Y-12 facility. Also, the new wells shall be included in all future monitoring events.

In addition, NGC did not implement our request to analyze groundwater samples for 1,4-dioxane and perchlorate. Ms. McKeith's letter stated that Northrop did not sample for 1,4-dioxane because there was no evidence of 1,4-dioxane in samples collected in 2002 in any of the NGC-installed monitoring wells, and sampling the new wells would not add any material new information to the groundwater investigation. However, the sampling was conducted in 2001, not 2002, and 1,4-dioxane was detected at values ranging from 0.52 micrograms per liter ($\mu\text{g/l}$) to 5.4 $\mu\text{g/l}$ in wells NMW-1, NMW-2, NMW-3, NMW-4 and NMW-7.

1,4-dioxane is a stabilizer that is commonly used in solvents containing TCE and TCA. NGC has used both TCA and TCE in its degreasing operation at the Y-12 facility. In light of this fact, and the previous detection of 1,4-dioxane in monitoring wells at the site, in accordance with



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Section 13267 of the California Water Code, you are hereby directed to submit a technical report that includes analytical results for 1,4-dioxane for all wells, for the next two groundwater-monitoring events for the Y-12 facility. Also, our request for NGC to analyze groundwater samples for perchlorate was not an order. It was merely to solicit your assistance in obtaining information to enable us to better characterize the presence of perchlorate in the Orange County groundwater basin. Since NGC does not intend to analyze groundwater samples for perchlorate, please notify Board staff at least five days prior to the next sampling event, so Board staff can be present to obtain samples from NGC's monitoring wells.

If you have any questions, please contact Maneck G. Chichgar, Project Manager, at (909) 782-3252, or you may call Ann Sturdivant, Chief of our SLIC/DoD Section, at (909) 782-4904.

Sincerely,

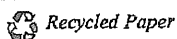


Gerard J. Thibeault
Executive Officer

cc: Malissa McKeith, Loeb and Loeb, LLP
Virginia Grebbien, OCWD
Mark Zeko, EEC, Inc.

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